

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

UNITES STATES OF AMERICA, : CASE NO. 3:11cr00080  
: (Judge Thomas M. Rose)  
Plaintiff, :  
: vs.  
: :  
CAROL A. WILSON, : **DEMAND FOR DISCOVERY**  
: :  
Defendant. :  

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Now comes the Defendant, CAROL A. WILSON, by and through Counsel, and pursuant to Fed. R. Crim. P. 16, respectfully requests this Honorable Court to order the Assistant United States Attorney to inform defense counsel of all discoverable evidence in the possession of the Prosecuting Attorney and to provide defense counsel with the following information:

1. Copies of **all** written and/or recorded statements made by the Defendant to any prosecuting attorney or law enforcement officer associated with this case;
2. Written summaries of **all** oral statements made by the Defendant;
3. Copies of all plea agreements entered between the State and any co-defendants, including a transcript of any testimony given by said co-defendants at their plea hearings;
4. A copy of Defendant's prior criminal and traffic records;
5. To advise defense counsel in writing of, and to permit defense counsel to inspect, copy or photograph, **all** evidence that the prosecuting attorney intends to use at trial, and/or evidence that is material to the preparation of Defendant's defense, including books, charts, accounts or ledgers, papers, documents, photographs, videotapes, audiotapes, clothing, tangible objects, buildings, places, reports, the results of all diagnostic examinations taken of the Defendant, victim and/or any witnesses; the results of all scientific tests, examination or experiments performed, including but not limited to autopsy reports, polygraphs, fingerprint analyses, laboratory drug tests, blood/DNA tests, chemical/toxicology tests, and the names, addresses and phone numbers of the individuals who performed these tests, examinations or experiments;
6. A written list of the names, addresses and telephone numbers of **all** lay and expert witnesses that the prosecuting attorney intends to call at trial, including all prior

| felony convictions of these witnesses;

7. Copies of **all** written and/or recorded statements made by any witnesses and/or co-defendants to any prosecuting attorney or law enforcement officer associated with this case;

8. Written summaries of **all** oral statements made by any witnesses and/or co-defendants;

9. All evidence known, or which may become known, to the prosecuting attorney which is favorable to the Defendant or exculpatory, and/or evidence which may impact on punishment if Defendant is convicted;

10. **Copies of all police reports prepared for this case**, including all offense reports, narrative reports and supplementary reports;

11. The names, addresses and phone numbers of all confidential informants that were relied upon by the State to obtain a search warrant, arrest warrant and/or relied upon by the State in its investigation of this case;

12. If subsequent to the compliance with this Demand for Discovery (prior to or during trial), the prosecuting attorney discovers additional matters which would have been subject to discovery or inspection under this Demand, the Defendant hereby demands that the prosecuting attorney **immediately** notify Defendant's Counsel of the existence of the additional matter and make said **immediately** available for discovery or inspection.

Respectfully submitted,

JAMES T. AMBROSE, LLC

S/James T. Ambrose

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Attorney for Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the above was served upon Segev Phillips, Esq., at this office at the United States Attorney's Office via Electronic Notification by the Clerk of Courts on this day of filing.

*S/James T. Ambrose*  
JAMES T. AMBROSE

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